April 22, 2004

Ms. Jennifer J. Johnson
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Re: Docket No. R-1180

Dear Ms. Johnson:

Thank you for the opportunity to provide recommendations on regulatory burden reduction.

Community First Bankshares is a $5.5 billion financial services company, and operates 138 offices in 12 states – Arizona, California, Colorado, Iowa, Minnesota, Nebraska, New Mexico, North Dakota, South Dakota, Utah, Wisconsin and Wyoming.

In order to assist the regulatory agencies in the reduction of unnecessary or unduly burdensome rules we at Community First Bankshares would like to submit the following suggestions:

1. With respect to disclosures related to certain real estate related loan applications, we recommend that a financial institution be provided three business days for which to provide a loan applicant the following:
    - Servicing disclosure
    - Affiliated Business Arrangement disclosure
    - When Your Home is on the Line booklet
    - Consumer Handbook on Adjustable Rate Mortgages (Charm) booklet
    - Home Equity Line of Credit early disclosure
    - Adjustable Rate Mortgage early disclosure
    - Federal Credit Application Insurance Disclosure

It is difficult to ensure these documents are consistantly provided in a timely manner throughout an entire organization when relying on lenders to deliver them at the time of a face to face loan application. It is likely that these timing rules were contemplated when there was less centralization in loan application processing. Now, centralized processing is the norm and the rules should keep pace. A three-day grace period for mailing all of these documents will avoid bank staff and client confusion, and would result in more consistent and accurate

disclosures, which in end helps the consumer. What we are suggesting for timing of delivery (3 days) for the above named disclosures has already been a long-standing rule under RESPA for the Good Faith Estimate and the Early Truth-in-Lending disclosures. We see no reason why the above named disclosures should be treated differently.

2. We recommend the Good Faith Estimate not require the name or specific relationship of the providers. This information is provided on the HUD 1 and HUD 1A. The applicant is able to identify the cost of the product from the Good Faith Estimate with or without the required provider.

3. We recommend the applicant be provided the ability to waive the Right of Rescission under Truth-in-Lending. Seldom if ever does a client rescind. In many cases our clients become very upset when the delay for funding is imposed under the regulation. As an alternative, we suggest requiring the applicants to sign a statement informing them of the implications of waiving this right and require lenders to retain a copy in their files.

4. We recommend rescinding the requirement of an applicant's signature on the Servicing Disclosure. This is impractical, inconsistent, and does not serve a useful purpose. Receipt of the disclosure by mail as suggested in the first recommendation is sufficient.

5. We recommend a simplification of the rules regarding the collection of Government Monitoring Information of the Home Mortgage Disclosure Act. The rules are very complex, especially as they pertain to commercial lending. At a minimum, there should not be a penalty for inadvertently collecting data when not necessary.

Thanks for the opportunity to provide our input.

Sincerely,

Earl Jarolimek
Vice President and Corporate Compliance Officer